Electronically Filed
Docket: 26-CCB-0018
Document: 17
Filing Date: 07/11/2026 10:58:43 PM EDT

BEFORE THE COPYRIGHT CLAIMS BOARD
UNITED STATES COPYRIGHT OFFICE

Andy Joel Rivera Aquino (aka Andy Joel), Claimant, v. **Lunchbox Tattoo / John Bolger,** Respondent.	**Docket No. 26-CCB-0018** **RESPONDENT'S REPLY TO CLAIMANT'S OBJECTION TO AMEND SCHEDULING ORDER**

Respondent John Bolger respectfully submits this Reply to correct the record regarding Claimant's highly misleading filing dated July 11, 2026 (Case doc. #16). Respondent's request for a modest 14-day extension is a routine administrative motion brought in absolute good faith to allow adequate time to fully organize and format the extensive visual and documentary evidence supporting the answer and counterclaims.

1. Respondent's Proactive Correction Disproves Claimant's Deceptive Claims
Claimant attempts to manufacture an allegation of fraud out of a routine, self-corrected administrative typo.

- On **July 10, 2026, at 12:01 PM**, Respondent submitted a request containing a clerical error (Case doc. #14).
- Upon independently identifying the error, Respondent acted with absolute transparency and immediately corrected the record by filing an updated, proper scheduling request less than six hours later at **5:59 PM** (Case doc. #15).

Claimant willfully ignored the corrected record. He waited nearly 24 hours until **July 11, 2026, at 4:34 PM**, to file an objection (Case doc. #16) targeting a clerical error that had already been corrected on the docket. Weaponizing a transparent procedural amendment as "bad-faith conduct" demonstrates a hostile litigation strategy designed solely to distract from the underlying merits of this dispute.

2. Chronological Priority Proves Claimant is Utilizing This Board in Bad Faith
Claimant attempts to mischaracterize a legitimate state collection action (*Illinois Circuit Court Case No. 2026SC001560*) as "extra-judicial leverage." This assertion is a factual impossibility. Respondent formally demanded the outstanding commercial rent arrears from the Claimant long before any dispute regarding marketing photography was ever raised, and long before this federal proceeding was initiated. The historical records conclusively document that the commercial debt existed as a standalone operational issue. It was the Claimant who subsequently weaponized this tribunal as a retaliatory shield to evade his pre-existing contract liabilities in violation of the spirit and protections of 17 U.S.C. § 1506(y).

3. A Standard 14-Day Extension Causes Zero Prejudice
Claimant's assertion that a brief, 14-day realignment to organize business portfolio documentation constitutes an "unnecessary delay" is entirely without merit. It causes zero prejudice to the efficient and just resolution of this proceeding.

CONCLUSION
Respondent's Request to Amend Scheduling Order is necessary, reasonable, and transparent. Respondent respectfully requests that the Board grant the 14-day extension and disregard Claimant's hollow objections.
Dated: July 11, 2026

Respectfully submitted,
/s/ John Bolger
John Bolger, Respondent
lunchboxtattoo@gmail.com

•

Proof of Delivery

I hereby certify that on Saturday, July 11, 2026, I provided a true and correct copy of the Response to Objection to the following:

Andy J Rivera, represented by Andy J Rivera, served via ESERVICE at midwestartstudio@gmail.com

Signed: /s/ John Bolger